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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO,  
EASTERN DIVISION

WILLIAM BURKE,

Plaintiff,

v.

JAMES ALEX FIELDS JR.,  
VANGUARD AMERICA, ANDREW  
ANGLIN, GREGORY ANGLIN,  
DAILY STORMER, MOONBASE  
HOLDINGS, LLC, MORNING STAR  
MINISTRIES USA, INC., ANGLIN &  
ANGLIN, LLC, ROBERT RAY,  
MATTHEW HEIMBACH, THE  
TRADITIONALIST WORKER PARTY,  
JASON KESSLER, PROUD BOYS,  
RICHARD SPENCER, NATIONAL  
POLICY INSTITUTE, DAVID DUKE,  
NATIONALIST FRONT, AUGUSTUS  
SOL INVICTUS, HONORABLE  
SACRED KNIGHTS, JOHN DOE 1-  
1000 AND JANE DOE 1-1000,

Defendants.

Case No. 2:19 cv 2006

RESPONSE TO SHOW CAUSE ORDER

Judge: Hon. Michael H. Watson

Magistrate Elizabeth A. Preston Deavers

**PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE**

Now comes Plaintiff and for his *RESPONSE TO ORDER TO SHOW CAUSE ORDER*, states as follows:

1. National Policy Institute, Inc. (NPI) is or was a corporation organized under the laws of the state of Virginia.

2. According to the Virginia State Corporation Commission website, (NPI's) principle office address is 1001 A King Street, Alexandria VA 22314.
3. Upon information and belief, the entity remains in operation as a "think tank" for the white supremacy movement and has received donations since becoming de-active on the Virginia State Corporation Commission website.
4. On August 1, 2019, an individual at the address listed as its principle place of business was served with process. (Doc #9).
5. However, a follow-up delivery of the Complaint to that address was deemed undeliverable by the United States Postal Office. (Doc #24).
6. Plaintiff seeks 30 days to serve the National Policy Institute, Inc. or the entity formerly known as National Policy Institute, Inc., through its registered agent, C T Corporation System, which still appears as the "active" agent on the Virginia State Corporation Commission website.

**Wherefore** and for the reasons set forth above, there is good cause to permit an additional 30 days to serve The National Policy Institute, Inc. through its registered agent, C T Corporation System.

s/ Michael L. Fradin  
Attorney for Plaintiff

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on October 10, 2019, *Plaintiff's Response to Order to Show Cause* was filed electronically. Notice of this filing will be sent to all parties by operation of the court's electronic filing system. Parties may access this filing through the court's system.

/s/ Michael L. Fradin  
Attorney for Plaintiff